

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**IN RE TERRORIST ATTACK
ON SEPTEMBER 11, 2001**

**FEDERAL INSURANCE
COMPANY, et al,**

Plaintiffs,

v.

AL QAIDA, et al

Defendants

CIVIL ACTION NO.: 03 CV 6978

* * * * *

**DEFENDANT MUSLIM WORLD LEAGUE'S ANSWER TO FIRST AMENDED
COMPLAINT**

Defendant Muslim World League ("MWL"), through undersigned counsel, and pursuant to Rule 12, Fed. R. Civ. P., hereby submits its Answer to the Plaintiffs' Third Amended Complaint ("Complaint").

PARTIES

1. MWL does not possess sufficient information to admit or deny the allegations in paragraph 1.
2. MWL does not possess sufficient information to admit or deny the allegations in paragraph 2.
3. MWL does not possess sufficient information to admit or deny the allegations in paragraph 3.
4. MWL does not possess sufficient information to admit or deny the allegations in paragraph 4.
5. MWL does not possess sufficient information to admit or deny the allegations in paragraph 5.

6. MWL does not possess sufficient information to admit or deny the allegations in paragraph 6.
7. MWL does not possess sufficient information to admit or deny the allegations in paragraph 7.
8. MWL does not possess sufficient information to admit or deny the allegations in paragraph 8.
9. MWL does not possess sufficient information to admit or deny the allegations in paragraph 9.
10. MWL does not possess sufficient information to admit or deny the allegations in paragraph 10.
11. MWL does not possess sufficient information to admit or deny the allegations in paragraph 11.
12. MWL does not possess sufficient information to admit or deny the allegations in paragraph 12.
13. MWL does not possess sufficient information to admit or deny the allegations in paragraph 13.
14. MWL does not possess sufficient information to admit or deny the allegations in paragraph 14.
15. MWL does not possess sufficient information to admit or deny the allegations in paragraph 15.
16. MWL does not possess sufficient information to admit or deny the allegations in paragraph 16.

17. MWL does not possess sufficient information to admit or deny the allegations in paragraph 17.
18. MWL does not possess sufficient information to admit or deny the allegations in paragraph 18.
19. MWL does not possess sufficient information to admit or deny the allegations in paragraph 19.
20. MWL does not possess sufficient information to admit or deny the allegations in paragraph 20.
21. MWL does not possess sufficient information to admit or deny the allegations in paragraph 21.
22. MWL does not possess sufficient information to admit or deny the allegations in paragraph 22.
23. MWL does not possess sufficient information to admit or deny the allegations in paragraph 23.
24. MWL does not possess sufficient information to admit or deny the allegations in paragraph 24.
25. MWL does not possess sufficient information to admit or deny the allegations in paragraph 25.
26. MWL does not possess sufficient information to admit or deny the allegations in paragraph 26.
27. MWL does not possess sufficient information to admit or deny the allegations in paragraph 27.

28. MWL does not possess sufficient information to admit or deny the allegations in paragraph 28.
29. MWL does not possess sufficient information to admit or deny the allegations in paragraph 29.
30. MWL does not possess sufficient information to admit or deny the allegations in paragraph 30.
31. MWL does not possess sufficient information to admit or deny the allegations in paragraph 31.
32. MWL does not possess sufficient information to admit or deny the allegations in paragraph 32.
33. MWL does not possess sufficient information to admit or deny the allegations in paragraph 33.
34. MWL does not possess sufficient information to admit or deny the allegations in paragraph 34.
35. MWL does not possess sufficient information to admit or deny the allegations in paragraph 35.
36. MWL does not possess sufficient information to admit or deny the allegations in paragraph 36.
37. MWL does not possess sufficient information to admit or deny the allegations in paragraph 37.
38. MWL does not possess sufficient information to admit or deny the allegations in paragraph 38.

39. MWL does not possess sufficient information to admit or deny the allegations in paragraph 39.
40. MWL does not possess sufficient information to admit or deny the allegations in paragraph 40.
41. MWL does not possess sufficient information to admit or deny the allegations in paragraph 41.
42. MWL does not possess sufficient information to admit or deny the allegations in paragraph 42.
43. MWL does not possess sufficient information to admit or deny the allegations in paragraph 43.
44. MWL does not possess sufficient information to admit or deny the allegations in paragraph 44.
45. MWL does not possess sufficient information to admit or deny the allegations in paragraph 45.
46. MWL does not possess sufficient information to admit or deny the allegations in paragraph 46.
47. MWL does not possess sufficient information to admit or deny the allegations in paragraph 47.
48. MWL does not possess sufficient information to admit or deny the allegations in paragraph 48.
49. MWL does not possess sufficient information to admit or deny the allegations in paragraph 49.

50. MWL does not possess sufficient information to admit or deny the allegations in paragraph 50.
51. MWL does not possess sufficient information to admit or deny the allegations in paragraph 51.
52. MWL does not possess sufficient information to admit or deny the allegations in paragraph 52.
53. MWL does not possess sufficient information to admit or deny the allegations in paragraph 53.
54. MWL does not possess sufficient information to admit or deny the allegations in paragraph 54.
55. MWL does not possess sufficient information to admit or deny the allegations in paragraph 55.
56. MWL does not possess sufficient information to admit or deny the allegations in paragraph 56.
57. MWL does not possess sufficient information to admit or deny the allegations in paragraph 57.
58. MWL does not possess sufficient information to admit or deny the allegations in paragraph 58.
59. MWL does not possess sufficient information to admit or deny the allegations in paragraph 59.
60. MWL does not possess sufficient information to admit or deny the allegations in paragraph 60.

- 61. MWL does not possess sufficient information to admit or deny the allegations in paragraph 61.
- 62. MWL does not possess sufficient information to admit or deny the allegations in paragraph 62.
- 63. MWL does not possess sufficient information to admit or deny the allegations in paragraph 63.
- 64. MWL does not possess sufficient information to admit or deny the allegations in paragraph 64.
- 65. MWL does not possess sufficient information to admit or deny the allegations in paragraph 65.
- 66. MWL denies the allegations in paragraph 66 insofar as they relate to MWL.
MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 66.

JURISDICTION

- 67. MWL denies that this court has subject matter jurisdiction over MWL.
- 68. MWL does not possess sufficient information to admit or deny the allegations in paragraph 68.
- 69. MWL denies that venue is proper in this district.

FACTUAL BACKGROUND

- 70. MWL does not possess sufficient information to admit or deny the allegations in paragraph 70.
- 71. MWL does not possess sufficient information to admit or deny the allegations in paragraph 71.

72. MWL denies the allegations in paragraph 72 insofar as they relate to MWL.
MWL does not possess sufficient information to admit or deny the allegations in paragraph 72.
73. MWL denies the allegations in paragraph 73 insofar as they relate to MWL.
MWL does not possess sufficient information to admit or deny the allegations in paragraph 73.
74. MWL denies the allegations in paragraph 74 insofar as they relate to MWL.
MWL does not possess sufficient information to admit or deny the allegations in paragraph 74.

ORIGINS OF AL QAIDA

75. MWL does not possess sufficient information to admit or deny the allegations in paragraph 75.
76. MWL denies the allegations in paragraph 76 insofar as they relate to MWL.
MWL does not possess sufficient information to admit or deny the allegations in paragraph 76.
77. MWL does not possess sufficient information to admit or deny the allegations in paragraph 77.
78. MWL does not possess sufficient information to admit or deny the allegations in paragraph 78.

GENERAL ALLEGATIONS COMMON TO ALL CHARITY

DEFENDANTS

79. MWL denies the allegations in paragraph 79 insofar as they relate to MWL.
MWL does not possess sufficient information to admit or deny the allegations in paragraph 79.
80. MWL does not possess sufficient information to admit or deny the allegations in paragraph 80.
81. MWL does not possess sufficient information to admit or deny the allegations in paragraph 81.
82. MWL denies the allegations in paragraph 82 insofar as they relate to MWL.
MWL does not possess sufficient information to admit or deny the allegations in paragraph 82.
83. MWL denies the allegations in paragraph 83 insofar as they relate to MWL.
MWL does not possess sufficient information to admit or deny the allegations in paragraph 83.

BENEVOLENCE INTERNATIONAL FOUNDATION

84. The allegations of this paragraph constitute a conclusion of law to which no response is required. MWL does not possess sufficient information to admit or deny the allegations in paragraph 84.
85. MWL does not possess sufficient information to admit or deny the allegations in paragraph 85.
86. MWL does not possess sufficient information to admit or deny the allegations in paragraph 86.

- 87. MWL does not possess sufficient information to admit or deny the allegations in paragraph 87.
- 88. MWL does not possess sufficient information to admit or deny the allegations in paragraph 88.
- 89. MWL does not possess sufficient information to admit or deny the allegations in paragraph 89.
- 90. MWL denies the allegations in paragraph 90 insofar as they relate to MWL.
- 91. MWL does not possess sufficient information to admit or deny the allegations in paragraph 91.
- 92. MWL does not possess sufficient information to admit or deny the allegations in paragraph 92.
- 93. MWL does not possess sufficient information to admit or deny the allegations in paragraph 93.
- 94. MWL does not possess sufficient information to admit or deny the allegations in paragraph 94.
- 95. MWL does not possess sufficient information to admit or deny the allegations in paragraph 95.
- 96. MWL does not possess sufficient information to admit or deny the allegations in paragraph 96.
- 97. MWL does not possess sufficient information to admit or deny the allegations in paragraph 97.
- 98. MWL does not possess sufficient information to admit or deny the allegations in paragraph 98.

- 99. MWL does not possess sufficient information to admit or deny the allegations in paragraph 99.
- 100. MWL denies the allegations of paragraph 100 insofar as they relate to MWL.
- 101. MWL does not possess sufficient information to admit or deny the allegations in paragraph 101.
- 102. MWL does not possess sufficient information to admit or deny the allegations in paragraph 102.
- 103. MWL does not possess sufficient information to admit or deny the allegations in paragraph 103.
- 104. MWL does not possess sufficient information to admit or deny the allegations in paragraph 104.
- 105. MWL does not possess sufficient information to admit or deny the allegations in paragraph 105.
- 106. MWL does not possess sufficient information to admit or deny the allegations in paragraph 106.
- 107. MWL does not possess sufficient information to admit or deny the allegations in paragraph 107.
- 108. MWL does not possess sufficient information to admit or deny the allegations in paragraph 108.
- 109. MWL does not possess sufficient information to admit or deny the allegations in paragraph 109.
- 110. MWL does not possess sufficient information to admit or deny the allegations in paragraph 110.

111. MWL does not possess sufficient information to admit or deny the allegations in paragraph 111.

112. MWL does not possess sufficient information to admit or deny the allegations in paragraph 112.

THE MUSLIM WORLD LEAGUE

113. MWL admits that it was founded in 1962. MWL does not possess sufficient information to admit or deny the allegations in paragraph 113.

114. MWL does not possess sufficient information to admit or deny the allegations in paragraph 114.

115. MWL does not possess sufficient information to admit or deny the allegations in paragraph 115.

116. MWL denies the allegations in paragraph 116.

117. MWL denies the allegations in paragraph 117. MWL does not possess sufficient information to admit or deny the allegations in paragraph 117.

118. MWL denies the allegations in paragraph 118.

119. MWL does not possess sufficient information to admit or deny the allegations in paragraph 119.

120. MWL does not possess sufficient information to admit or deny the allegations in paragraph 120.

121. MWL does not possess sufficient information to admit or deny the allegations in paragraph 121.

122. MWL does not possess sufficient information to admit or deny the allegations in paragraph 122.

- 123. MWL denies the allegations in paragraph 123.
- 124. MWL denies the allegations in paragraph 124 as they relate to MWL. MWL does not possess sufficient information to admit or deny the allegations in paragraph 124.
- 125. MWL does not possess sufficient information to admit or deny the allegations in paragraph 125.
- 126. MWL does not possess sufficient information to admit or deny the allegations in paragraph 126.
- 127. MWL denies the allegations in paragraph 127 as they relate to MWL. MWL does not possess sufficient information to admit or deny the allegations in paragraph 127.
- 128. MWL denies the allegations in paragraph 128.
- 129. MWL denies the allegations in paragraph 129.

INTERNATIONAL ISLAMIC RELIEF ORGANIZATION (IIRO)

- 130. The allegations of this paragraph constitute a conclusion of law to which no response is required. MWL does not possess sufficient information to admit or deny the allegations in paragraph 130.
- 131. MWL does not possess sufficient information to admit or deny the allegations in paragraph 131.
- 132. MWL does not possess sufficient information to admit or deny the allegations in paragraph 132.
- 133. MWL does not possess sufficient information to admit or deny the allegations in paragraph 133.

134. MWL does not possess sufficient information to admit or deny the allegations in paragraph 134.
135. MWL does not possess sufficient information to admit or deny the allegations in paragraph 135.
136. MWL does not possess sufficient information to admit or deny the allegations in paragraph 136.
137. MWL does not possess sufficient information to admit or deny the allegations in paragraph 137.
138. MWL does not possess sufficient information to admit or deny the allegations in paragraph 138.
139. MWL does not possess sufficient information to admit or deny the allegations in paragraph 139.
140. MWL does not possess sufficient information to admit or deny the allegations in paragraph 140.
141. MWL does not possess sufficient information to admit or deny the allegations in paragraph 141.
142. MWL does not possess sufficient information to admit or deny the allegations in paragraph 142.
143. MWL does not possess sufficient information to admit or deny the allegations in paragraph 143.
144. MWL does not possess sufficient information to admit or deny the allegations in paragraph 144.

- 145. MWL does not possess sufficient information to admit or deny the allegations in paragraph 145.
- 146. MWL does not possess sufficient information to admit or deny the allegations in paragraph 146.
- 147. MWL does not possess sufficient information to admit or deny the allegations in paragraph 147.
- 148. MWL does not possess sufficient information to admit or deny the allegations in paragraph 148.
- 149. MWL does not possess sufficient information to admit or deny the allegations in paragraph 149.

WORLD ASSEMBLY OF MUSLIM YOUTH

- 150. The allegations of this paragraph constitute a conclusion of law to which no response is required. MWL does not possess sufficient information to admit or deny the allegations in paragraph 150.
- 151. MWL does not possess sufficient information to admit or deny the allegations in paragraph 151.
- 152. MWL does not possess sufficient information to admit or deny the allegations in paragraph 152.
- 153. MWL does not possess sufficient information to admit or deny the allegations in paragraph 153.
- 154. MWL does not possess sufficient information to admit or deny the allegations in paragraph 154.

155. MWL does not possess sufficient information to admit or deny the allegations in paragraph 155.
156. MWL does not possess sufficient information to admit or deny the allegations in paragraph 156.
157. MWL does not possess sufficient information to admit or deny the allegations in paragraph 157.
158. MWL does not possess sufficient information to admit or deny the allegations in paragraph 158.
159. MWL does not possess sufficient information to admit or deny the allegations in paragraph 159.
160. MWL does not possess sufficient information to admit or deny the allegations in paragraph 160.
161. MWL does not possess sufficient information to admit or deny the allegations in paragraph 161.
162. MWL does not possess sufficient information to admit or deny the allegations in paragraph 162.
163. MWL does not possess sufficient information to admit or deny the allegations in paragraph 163.
164. MWL does not possess sufficient information to admit or deny the allegations in paragraph 164.
165. MWL does not possess sufficient information to admit or deny the allegations in paragraph 165.

166. MWL does not possess sufficient information to admit or deny the allegations in paragraph 166.

AL HARAMAIN ISLAMIC FOUNDATION

167. MWL does not possess sufficient information to admit or deny the allegations in paragraph 166.

168. MWL does not possess sufficient information to admit or deny the allegations in paragraph 168.

169. MWL does not possess sufficient information to admit or deny the allegations in paragraph 169.

170. MWL does not possess sufficient information to admit or deny the allegations in paragraph 170.

171. MWL does not possess sufficient information to admit or deny the allegations in paragraph 171.

172. MWL does not possess sufficient information to admit or deny the allegations in paragraph 172.

173. MWL does not possess sufficient information to admit or deny the allegations in paragraph 173.

174. MWL does not possess sufficient information to admit or deny the allegations in paragraph 174.

175. MWL does not possess sufficient information to admit or deny the allegations in paragraph 175.

176. MWL does not possess sufficient information to admit or deny the allegations in paragraph 176.

177. MWL does not possess sufficient information to admit or deny the allegations in paragraph 177.

178. MWL does not possess sufficient information to admit or deny the allegations in paragraph 178.

179. MWL does not possess sufficient information to admit or deny the allegations in paragraph 179.

SAUDI HIGH COMMISSION

180. MWL does not possess sufficient information to admit or deny the allegations in paragraph 180.

181. MWL does not possess sufficient information to admit or deny the allegations in paragraph 181.

182. MWL does not possess sufficient information to admit or deny the allegations in paragraph 182.

183. MWL does not possess sufficient information to admit or deny the allegations in paragraph 183.

184. MWL does not possess sufficient information to admit or deny the allegations in paragraph 184.

185. MWL does not possess sufficient information to admit or deny the allegations in paragraph 185.

186. MWL does not possess sufficient information to admit or deny the allegations in paragraph 186.

187. MWL does not possess sufficient information to admit or deny the allegations in paragraph 187.

188. MWL does not possess sufficient information to admit or deny the allegations in paragraph 188.

189. MWL does not possess sufficient information to admit or deny the allegations in paragraph 189.

SAUDI RED CRESENT SOCIETY

190. MWL does not possess sufficient information to admit or deny the allegations in paragraph 190.

191. MWL does not possess sufficient information to admit or deny the allegations in paragraph 191.

192. MWL does not possess sufficient information to admit or deny the allegations in paragraph 192.

193. MWL does not possess sufficient information to admit or deny the allegations in paragraph 193.

194. MWL does not possess sufficient information to admit or deny the allegations in paragraph 194.

195. MWL does not possess sufficient information to admit or deny the allegations in paragraph 195.

196. MWL does not possess sufficient information to admit or deny the allegations in paragraph 196.

197. MWL does not possess sufficient information to admit or deny the allegations in paragraph 197.

198. MWL does not possess sufficient information to admit or deny the allegations in paragraph 198.

199. MWL does not possess sufficient information to admit or deny the allegations in paragraph 199.

200. MWL does not possess sufficient information to admit or deny the allegations in paragraph 200.

201. MWL does not possess sufficient information to admit or deny the allegations in paragraph 201.

202. MWL does not possess sufficient information to admit or deny the allegations in paragraph 202.

SAUDI JOINT RELIEF COMMITTEE FOR KOSOVO AND CHECHNYA

203. MWL does not possess sufficient information to admit or deny the allegations in paragraph 203.

204. MWL does not possess sufficient information to admit or deny the allegations in paragraph 204.

205. MWL does not possess sufficient information to admit or deny the allegations in paragraph 205.

206. MWL does not possess sufficient information to admit or deny the allegations in paragraph 206.

207. MWL does not possess sufficient information to admit or deny the allegations in paragraph 207.

RABITA TRUST

208. The allegations of this paragraph constitute a conclusion of law to which no response is required. MWL does not possess sufficient information to admit or deny the allegations in paragraph 208.

- 209. MWL does not possess sufficient information to admit or deny the allegations in paragraph 209.
- 210. MWL does not possess sufficient information to admit or deny the allegations in paragraph 210.
- 211. MWL does not possess sufficient information to admit or deny the allegations in paragraph 211.
- 212. MWL does not possess sufficient information to admit or deny the allegations in paragraph 212.
- 213. MWL does not possess sufficient information to admit or deny the allegations in paragraph 213.
- 214. MWL does not possess sufficient information to admit or deny the allegations in paragraph 214.
- 215. MWL does not possess sufficient information to admit or deny the allegations in paragraph 215.
- 216. MWL does not possess sufficient information to admit or deny the allegations in paragraph 216.

GLOBAL RELIEF FOUNDATION

- 217. MWL does not possess sufficient information to admit or deny the allegations in paragraph 217.
- 218. MWL does not possess sufficient information to admit or deny the allegations in paragraph 218.
- 219. MWL does not possess sufficient information to admit or deny the allegations in paragraph 219.

220. MWL does not possess sufficient information to admit or deny the allegations in paragraph 220.

221. MWL does not possess sufficient information to admit or deny the allegations in paragraph 221.

THE SAAR NETWORK

222. MWL does not possess sufficient information to admit or deny the allegations in paragraph 222.

223. MWL does not possess sufficient information to admit or deny the allegations in paragraph 223.

224. MWL does not possess sufficient information to admit or deny the allegations in paragraph 224.

225. MWL does not possess sufficient information to admit or deny the allegations in paragraph 225.

226. MWL does not possess sufficient information to admit or deny the allegations in paragraph 226.

227. MWL does not possess sufficient information to admit or deny the allegations in paragraph 227.

228. MWL does not possess sufficient information to admit or deny the allegations in paragraph 228.

229. MWL does not possess sufficient information to admit or deny the allegations in paragraph 229.

230. MWL does not possess sufficient information to admit or deny the allegations in paragraph 230.

231. MWL does not possess sufficient information to admit or deny the allegations in paragraph 231.

232. MWL does not possess sufficient information to admit or deny the allegations in paragraph 232.

BLESSED RELIEF (MUWAFaq) FOUNDATION

233. MWL does not possess sufficient information to admit or deny the allegations in paragraph 233.

234. MWL does not possess sufficient information to admit or deny the allegations in paragraph 234.

235. MWL does not possess sufficient information to admit or deny the allegations in paragraph 235.

236. MWL does not possess sufficient information to admit or deny the allegations in paragraph 236.

237. MWL does not possess sufficient information to admit or deny the allegations in paragraph 237.

TAIBAH INTERNATIONAL AID ASSOCIATION

238. MWL does not possess sufficient information to admit or deny the allegations in paragraph 238.

239. MWL does not possess sufficient information to admit or deny the allegations in paragraph 239.

240. MWL does not possess sufficient information to admit or deny the allegations in paragraph 240.

- 241. MWL does not possess sufficient information to admit or deny the allegations in paragraph 241.
- 242. MWL does not possess sufficient information to admit or deny the allegations in paragraph 242.
- 243. MWL does not possess sufficient information to admit or deny the allegations in paragraph 243.
- 244. MWL does not possess sufficient information to admit or deny the allegations in paragraph 244.
- 245. MWL does not possess sufficient information to admit or deny the allegations in paragraph 245.
- 246. MWL does not possess sufficient information to admit or deny the allegations in paragraph 246.
- 247. MWL does not possess sufficient information to admit or deny the allegations in paragraph 247.
- 248. MWL does not possess sufficient information to admit or deny the allegations in paragraph 248.
- 249. MWL does not possess sufficient information to admit or deny the allegations in paragraph 249.
- 250. MWL does not possess sufficient information to admit or deny the allegations in paragraph 250.
- 251. MWL does not possess sufficient information to admit or deny the allegations in paragraph 251.

252. MWL does not possess sufficient information to admit or deny the allegations in paragraph 252.

AL QUAIDA'S PARTNERS IN THE INTERNATIONAL BANKING SYSTEM

253. MWL does not possess sufficient information to admit or deny the allegations in paragraph 253.
254. MWL does not possess sufficient information to admit or deny the allegations in paragraph 254.
255. MWL does not possess sufficient information to admit or deny the allegations in paragraph 255.
256. MWL does not possess sufficient information to admit or deny the allegations in paragraph 256.
257. MWL does not possess sufficient information to admit or deny the allegations in paragraph 257.
258. MWL does not possess sufficient information to admit or deny the allegations in paragraph 258.

THE AL TAQWA FINANCIAL NETWORK

259. MWL does not possess sufficient information to admit or deny the allegations in paragraph 259.
260. MWL does not possess sufficient information to admit or deny the allegations in paragraph 260.
261. MWL does not possess sufficient information to admit or deny the allegations in paragraph 261.

262. MWL does not possess sufficient information to admit or deny the allegations in paragraph 262.

263. MWL does not possess sufficient information to admit or deny the allegations in paragraph 263.

264. MWL does not possess sufficient information to admit or deny the allegations in paragraph 264.

265. MWL does not possess sufficient information to admit or deny the allegations in paragraph 265.

266. MWL does not possess sufficient information to admit or deny the allegations in paragraph 266.

267. MWL does not possess sufficient information to admit or deny the allegations in paragraph 267.

268. MWL does not possess sufficient information to admit or deny the allegations in paragraph 268.

269. MWL does not possess sufficient information to admit or deny the allegations in paragraph 269.

AL BARAKAAT GROUP

270. MWL does not possess sufficient information to admit or deny the allegations in paragraph 270.

271. MWL does not possess sufficient information to admit or deny the allegations in paragraph 271.

272. MWL does not possess sufficient information to admit or deny the allegations in paragraph 272.

273. MWL does not possess sufficient information to admit or deny the allegations in paragraph 273.

274. MWL does not possess sufficient information to admit or deny the allegations in paragraph 274.

AL RAJHI BANKING AND INVESTMENT GROUP

275. MWL does not possess sufficient information to admit or deny the allegations in paragraph 275.

276. MWL does not possess sufficient information to admit or deny the allegations in paragraph 276.

277. MWL does not possess sufficient information to admit or deny the allegations in paragraph 277.

278. MWL does not possess sufficient information to admit or deny the allegations in paragraph 278.

279. MWL does not possess sufficient information to admit or deny the allegations in paragraph 279.

280. MWL does not possess sufficient information to admit or deny the allegations in paragraph 280.

281. MWL does not possess sufficient information to admit or deny the allegations in paragraph 281.

282. MWL does not possess sufficient information to admit or deny the allegations in paragraph 282.

283. MWL does not possess sufficient information to admit or deny the allegations in paragraph 283.

284. MWL does not possess sufficient information to admit or deny the allegations in paragraph 284.

NATIONAL COMMERCE BANK

285. MWL does not possess sufficient information to admit or deny the allegations in paragraph 285.

286. MWL does not possess sufficient information to admit or deny the allegations in paragraph 286.

287. MWL does not possess sufficient information to admit or deny the allegations in paragraph 287.

288. MWL does not possess sufficient information to admit or deny the allegations in paragraph 288.

289. MWL does not possess sufficient information to admit or deny the allegations in paragraph 289.

290. MWL does not possess sufficient information to admit or deny the allegations in paragraph 290.

291. MWL does not possess sufficient information to admit or deny the allegations in paragraph 291.

292. MWL does not possess sufficient information to admit or deny the allegations in paragraph 292.

293. MWL does not possess sufficient information to admit or deny the allegations in paragraph 293.

294. MWL does not possess sufficient information to admit or deny the allegations in paragraph 294.

295. MWL does not possess sufficient information to admit or deny the allegations in paragraph 295.

296. MWL does not possess sufficient information to admit or deny the allegations in paragraph 296.

297. MWL does not possess sufficient information to admit or deny the allegations in paragraph 297.

AL BARAKA INVESTMENT AND DEVELOPMENT CORPORATION

298. MWL does not possess sufficient information to admit or deny the allegations in paragraph 298.

299. MWL does not possess sufficient information to admit or deny the allegations in paragraph 299.

300. MWL does not possess sufficient information to admit or deny the allegations in paragraph 300.

301. MWL does not possess sufficient information to admit or deny the allegations in paragraph 301.

302. MWL does not possess sufficient information to admit or deny the allegations in paragraph 302.

303. MWL does not possess sufficient information to admit or deny the allegations in paragraph 303.

304. MWL does not possess sufficient information to admit or deny the allegations in paragraph 304.

305. MWL does not possess sufficient information to admit or deny the allegations in paragraph 305.

306. MWL does not possess sufficient information to admit or deny the allegations in paragraph 306.

DAR-AL-MAAL AL ISLAMI

307. MWL does not possess sufficient information to admit or deny the allegations in paragraph 307.

308. MWL does not possess sufficient information to admit or deny the allegations in paragraph 308.

309. MWL does not possess sufficient information to admit or deny the allegations in paragraph 309.

310. MWL does not possess sufficient information to admit or deny the allegations in paragraph 310.

311. MWL does not possess sufficient information to admit or deny the allegations in paragraph 311.

312. MWL does not possess sufficient information to admit or deny the allegations in paragraph 312.

FAISAL ISLAMIC BANK - SUDAN

313. MWL does not possess sufficient information to admit or deny the allegations in paragraph 313.

314. MWL does not possess sufficient information to admit or deny the allegations in paragraph 314.

315. MWL does not possess sufficient information to admit or deny the allegations in paragraph 315.

316. MWL does not possess sufficient information to admit or deny the allegations in paragraph 316.

317. MWL does not possess sufficient information to admit or deny the allegations in paragraph 317.

318. MWL does not possess sufficient information to admit or deny the allegations in paragraph 318.

319. MWL does not possess sufficient information to admit or deny the allegations in paragraph 319.

AL SHAMAL ISLAMIC BANK

320. MWL does not possess sufficient information to admit or deny the allegations in paragraph 320.

321. MWL does not possess sufficient information to admit or deny the allegations in paragraph 321.

322. MWL does not possess sufficient information to admit or deny the allegations in paragraph 322.

323. MWL does not possess sufficient information to admit or deny the allegations in paragraph 323.

324. MWL does not possess sufficient information to admit or deny the allegations in paragraph 324.

325. MWL does not possess sufficient information to admit or deny the allegations in paragraph 325.

326. MWL does not possess sufficient information to admit or deny the allegations in paragraph 326.

- 327. MWL does not possess sufficient information to admit or deny the allegations in paragraph 327.
- 328. MWL does not possess sufficient information to admit or deny the allegations in paragraph 328.
- 329. MWL does not possess sufficient information to admit or deny the allegations in paragraph 329.
- 330. MWL does not possess sufficient information to admit or deny the allegations in paragraph 330.
- 331. MWL does not possess sufficient information to admit or deny the allegations in paragraph 331.
- 332. MWL does not possess sufficient information to admit or deny the allegations in paragraph 332.
- 333. MWL does not possess sufficient information to admit or deny the allegations in paragraph 333.

TADAMON ISLAMIC BANK

- 334. MWL does not possess sufficient information to admit or deny the allegations in paragraph 334.
- 335. MWL does not possess sufficient information to admit or deny the allegations in paragraph 335.
- 336. MWL does not possess sufficient information to admit or deny the allegations in paragraph 336.
- 337. MWL does not possess sufficient information to admit or deny the allegations in paragraph 337.

338. MWL does not possess sufficient information to admit or deny the allegations in paragraph 338.

339. MWL does not possess sufficient information to admit or deny the allegations in paragraph 339.

340. MWL does not possess sufficient information to admit or deny the allegations in paragraph 340.

341. MWL does not possess sufficient information to admit or deny the allegations in paragraph 341.

342. MWL does not possess sufficient information to admit or deny the allegations in paragraph 342.

DUBAI ISLAMIC BANK

343. MWL does not possess sufficient information to admit or deny the allegations in paragraph 343.

344. MWL does not possess sufficient information to admit or deny the allegations in paragraph 344.

345. MWL does not possess sufficient information to admit or deny the allegations in paragraph 345.

346. MWL does not possess sufficient information to admit or deny the allegations in paragraph 346.

347. MWL does not possess sufficient information to admit or deny the allegations in paragraph 347.

348. MWL does not possess sufficient information to admit or deny the allegations in paragraph 348.

349. MWL does not possess sufficient information to admit or deny the allegations in paragraph 349.

350. MWL does not possess sufficient information to admit or deny the allegations in paragraph 350.

ISLAMIC DEVELOPMENT BANK

351. MWL does not possess sufficient information to admit or deny the allegations in paragraph 351.

352. MWL does not possess sufficient information to admit or deny the allegations in paragraph 352.

353. MWL does not possess sufficient information to admit or deny the allegations in paragraph 353.

354. MWL does not possess sufficient information to admit or deny the allegations in paragraph 354.

355. MWL does not possess sufficient information to admit or deny the allegations in paragraph 355.

356. MWL does not possess sufficient information to admit or deny the allegations in paragraph 356.

ARAB BANK, PLC

357. MWL does not possess sufficient information to admit or deny the allegations in paragraph 357.

358. MWL does not possess sufficient information to admit or deny the allegations in paragraph 358.

359. MWL does not possess sufficient information to admit or deny the allegations in paragraph 359.

360. MWL does not possess sufficient information to admit or deny the allegations in paragraph 360.

361. MWL does not possess sufficient information to admit or deny the allegations in paragraph 361.

362. MWL does not possess sufficient information to admit or deny the allegations in paragraph 362.

363. MWL does not possess sufficient information to admit or deny the allegations in paragraph 363.

364. MWL does not possess sufficient information to admit or deny the allegations in paragraph 364.

SAUDI AMERICAN BANK

365. MWL does not possess sufficient information to admit or deny the allegations in paragraph 365.

366. MWL does not possess sufficient information to admit or deny the allegations in paragraph 366.

367. MWL does not possess sufficient information to admit or deny the allegations in paragraph 367.

368. MWL does not possess sufficient information to admit or deny the allegations in paragraph 368.

369. MWL does not possess sufficient information to admit or deny the allegations in paragraph 369.

- 370. MWL does not possess sufficient information to admit or deny the allegations in paragraph 370.
- 371. MWL does not possess sufficient information to admit or deny the allegations in paragraph 371.
- 372. MWL does not possess sufficient information to admit or deny the allegations in paragraph 372.
- 373. MWL does not possess sufficient information to admit or deny the allegations in paragraph 373.
- 374. MWL does not possess sufficient information to admit or deny the allegations in paragraph 374.
- 375. MWL does not possess sufficient information to admit or deny the allegations in paragraph 375.

AL QAIDA'S SPONSORS AND PARTNERS IN THE BUSINESS COMMUNITY

- 376. MWL does not possess sufficient information to admit or deny the allegations in paragraph 376.
- 377. MWL does not possess sufficient information to admit or deny the allegations in paragraph 377.
- 378. MWL does not possess sufficient information to admit or deny the allegations in paragraph 378.
- 379. MWL does not possess sufficient information to admit or deny the allegations in paragraph 379.
- 380. MWL does not possess sufficient information to admit or deny the allegations in paragraph 380.

- 381. MWL does not possess sufficient information to admit or deny the allegations in paragraph 381.
- 382. MWL does not possess sufficient information to admit or deny the allegations in paragraph 382.
- 383. MWL does not possess sufficient information to admit or deny the allegations in paragraph 383.
- 384. MWL does not possess sufficient information to admit or deny the allegations in paragraph 384.
- 385. MWL does not possess sufficient information to admit or deny the allegations in paragraph 385.
- 386. MWL does not possess sufficient information to admit or deny the allegations in paragraph 386.
- 387. MWL does not possess sufficient information to admit or deny the allegations in paragraph 387.
- 388. MWL does not possess sufficient information to admit or deny the allegations in paragraph 388.
- 389. MWL does not possess sufficient information to admit or deny the allegations in paragraph 389.
- 390. MWL does not possess sufficient information to admit or deny the allegations in paragraph 390.
- 391. MWL does not possess sufficient information to admit or deny the allegations in paragraph 391.

392. MWL does not possess sufficient information to admit or deny the allegations in paragraph 392.

393. MWL does not possess sufficient information to admit or deny the allegations in paragraph 393.

394. MWL does not possess sufficient information to admit or deny the allegations in paragraph 394.

395. MWL does not possess sufficient information to admit or deny the allegations in paragraph 395.

396. MWL does not possess sufficient information to admit or deny the allegations in paragraph 396.

397. MWL does not possess sufficient information to admit or deny the allegations in paragraph 397.

KINGDOM OF SAUDI ARABIA, SAUDI ROYAL FAMILY AND SAUDI ELITES

398. MWL does not possess sufficient information to admit or deny the allegations in paragraph 398.

399. MWL does not possess sufficient information to admit or deny the allegations in paragraph 399.

400. MWL does not possess sufficient information to admit or deny the allegations in paragraph 400.

401. MWL does not possess sufficient information to admit or deny the allegations in paragraph 401.

402. MWL does not possess sufficient information to admit or deny the allegations in paragraph 402.

- 403. MWL does not possess sufficient information to admit or deny the allegations in paragraph 403.
- 404. MWL does not possess sufficient information to admit or deny the allegations in paragraph 404.
- 405. MWL does not possess sufficient information to admit or deny the allegations in paragraph 405.
- 406. MWL does not possess sufficient information to admit or deny the allegations in paragraph 406.
- 407. MWL does not possess sufficient information to admit or deny the allegations in paragraph 407.
- 408. MWL does not possess sufficient information to admit or deny the allegations in paragraph 408.
- 409. MWL does not possess sufficient information to admit or deny the allegations in paragraph 409.
- 410. MWL does not possess sufficient information to admit or deny the allegations in paragraph 410.
- 411. MWL does not possess sufficient information to admit or deny the allegations in paragraph 411.
- 412. MWL does not possess sufficient information to admit or deny the allegations in paragraph 412.
- 413. MWL does not possess sufficient information to admit or deny the allegations in paragraph 413.

- 414. MWL does not possess sufficient information to admit or deny the allegations in paragraph 414.
- 415. MWL does not possess sufficient information to admit or deny the allegations in paragraph 415.
- 416. MWL does not possess sufficient information to admit or deny the allegations in paragraph 416.
- 417. MWL does not possess sufficient information to admit or deny the allegations in paragraph 417.
- 418. MWL does not possess sufficient information to admit or deny the allegations in paragraph 418.
- 419. MWL does not possess sufficient information to admit or deny the allegations in paragraph 419.
- 420. MWL does not possess sufficient information to admit or deny the allegations in paragraph 420.
- 421. MWL does not possess sufficient information to admit or deny the allegations in paragraph 421.
- 422. MWL does not possess sufficient information to admit or deny the allegations in paragraph 422.
- 423. MWL does not possess sufficient information to admit or deny the allegations in paragraph 423.
- 424. MWL does not possess sufficient information to admit or deny the allegations in paragraph 424.

425. MWL does not possess sufficient information to admit or deny the allegations in paragraph 425.
426. MWL does not possess sufficient information to admit or deny the allegations in paragraph 426.
427. MWL does not possess sufficient information to admit or deny the allegations in paragraph 427.
428. MWL does not possess sufficient information to admit or deny the allegations in paragraph 428.
429. MWL does not possess sufficient information to admit or deny the allegations in paragraph 429.
430. MWL does not possess sufficient information to admit or deny the allegations in paragraph 430.
431. MWL denies the allegations in paragraph 431 insofar as they relate to MWL.
MWL does not possess sufficient information to admit or deny the allegations in paragraph 431.
432. MWL does not possess sufficient information to admit or deny the allegations in paragraph 432.
433. MWL does not possess sufficient information to admit or deny the allegations in paragraph 433.
434. MWL does not possess sufficient information to admit or deny the allegations in paragraph 434.
435. MWL does not possess sufficient information to admit or deny the allegations in paragraph 435.

436. MWL does not possess sufficient information to admit or deny the allegations in paragraph 436.
437. MWL does not possess sufficient information to admit or deny the allegations in paragraph 437.
438. MWL does not possess sufficient information to admit or deny the allegations in paragraph 438.
439. MWL does not possess sufficient information to admit or deny the allegations in paragraph 439.
440. MWL does not possess sufficient information to admit or deny the allegations in paragraph 440.
441. MWL does not possess sufficient information to admit or deny the allegations in paragraph 441.
442. MWL does not possess sufficient information to admit or deny the allegations in paragraph 442.
443. MWL denies the allegations in paragraph 443 insofar as they relate to MWL.
MWL does not possess sufficient information to admit or deny the allegations in paragraph 443.
444. MWL does not possess sufficient information to admit or deny the allegations in paragraph 444.
445. MWL does not possess sufficient information to admit or deny the allegations in paragraph 445.
446. MWL does not possess sufficient information to admit or deny the allegations in paragraph 446.

447. MWL does not possess sufficient information to admit or deny the allegations in paragraph 447.
448. MWL does not possess sufficient information to admit or deny the allegations in paragraph 448.
449. MWL does not possess sufficient information to admit or deny the allegations in paragraph 449.
450. MWL does not possess sufficient information to admit or deny the allegations in paragraph 450.
451. MWL does not possess sufficient information to admit or deny the allegations in paragraph 451.
452. MWL does not possess sufficient information to admit or deny the allegations in paragraph 452.
453. MWL denies the allegations in paragraph 453 insofar as they relate to MWL. MWL does not possess sufficient information to admit or deny the allegations in paragraph 453.
454. MWL does not possess sufficient information to admit or deny the allegations in paragraph 454.
455. MWL does not possess sufficient information to admit or deny the allegations in paragraph 455.
456. MWL does not possess sufficient information to admit or deny the allegations in paragraph 456.
457. MWL does not possess sufficient information to admit or deny the allegations in paragraph 457.

458. MWL does not possess sufficient information to admit or deny the allegations in paragraph 458.
459. MWL does not possess sufficient information to admit or deny the allegations in paragraph 459.
460. MWL does not possess sufficient information to admit or deny the allegations in paragraph 460.
461. MWL does not possess sufficient information to admit or deny the allegations in paragraph 461.
462. MWL does not possess sufficient information to admit or deny the allegations in paragraph 462.
463. MWL denies the allegations in paragraph 463 insofar as they relate to MWL.
MWL does not possess sufficient information to admit or deny the allegations in paragraph 463.
464. MWL does not possess sufficient information to admit or deny the allegations in paragraph 464.
465. MWL does not possess sufficient information to admit or deny the allegations in paragraph 465.
466. MWL does not possess sufficient information to admit or deny the allegations in paragraph 466.
467. MWL does not possess sufficient information to admit or deny the allegations in paragraph 467.

468. MWL denies the allegations in paragraph 468 insofar as they relate to MWL.

MWL does not possess sufficient information to admit or deny the allegations in paragraph 468.

469. MWL does not possess sufficient information to admit or deny the allegations in paragraph 469.

470. MWL does not possess sufficient information to admit or deny the allegations in paragraph 470.

471. MWL does not possess sufficient information to admit or deny the allegations in paragraph 471.

472. MWL does not possess sufficient information to admit or deny the allegations in paragraph 472.

473. MWL does not possess sufficient information to admit or deny the allegations in paragraph 473.

474. MWL does not possess sufficient information to admit or deny the allegations in paragraph 474.

475. MWL does not possess sufficient information to admit or deny the allegations in paragraph 475.

476. MWL denies the allegations in paragraph 476 insofar as they relate to MWL.

MWL does not possess sufficient information to admit or deny the allegations in paragraph 476.

477. MWL does not possess sufficient information to admit or deny the allegations in paragraph 477.

- 478. MWL does not possess sufficient information to admit or deny the allegations in paragraph 478.
- 479. MWL does not possess sufficient information to admit or deny the allegations in paragraph 479.
- 480. MWL does not possess sufficient information to admit or deny the allegations in paragraph 480.
- 481. MWL does not possess sufficient information to admit or deny the allegations in paragraph 481.
- 482. MWL does not possess sufficient information to admit or deny the allegations in paragraph 482.
- 483. MWL does not possess sufficient information to admit or deny the allegations in paragraph 483.
- 484. MWL does not possess sufficient information to admit or deny the allegations in paragraph 484.
- 485. MWL does not possess sufficient information to admit or deny the allegations in paragraph 485.
- 486. MWL does not possess sufficient information to admit or deny the allegations in paragraph 486.
- 487. MWL does not possess sufficient information to admit or deny the allegations in paragraph 487.
- 488. MWL does not possess sufficient information to admit or deny the allegations in paragraph 488.

- 489. MWL does not possess sufficient information to admit or deny the allegations in paragraph 489.
- 490. MWL does not possess sufficient information to admit or deny the allegations in paragraph 490.
- 491. MWL does not possess sufficient information to admit or deny the allegations in paragraph 491.
- 492. MWL does not possess sufficient information to admit or deny the allegations in paragraph 492.
- 493. MWL does not possess sufficient information to admit or deny the allegations in paragraph 493.
- 494. MWL does not possess sufficient information to admit or deny the allegations in paragraph 494.
- 495. MWL does not possess sufficient information to admit or deny the allegations in paragraph 495.
- 496. MWL does not possess sufficient information to admit or deny the allegations in paragraph 496.
- 497. MWL does not possess sufficient information to admit or deny the allegations in paragraph 497.
- 498. MWL does not possess sufficient information to admit or deny the allegations in paragraph 498.
- 499. MWL does not possess sufficient information to admit or deny the allegations in paragraph 499.

500. MWL does not possess sufficient information to admit or deny the allegations in paragraph 500.

501. MWL does not possess sufficient information to admit or deny the allegations in paragraph 501.

502. MWL does not possess sufficient information to admit or deny the allegations in paragraph 502.

503. MWL does not possess sufficient information to admit or deny the allegations in paragraph 503.

504. MWL does not possess sufficient information to admit or deny the allegations in paragraph 504.

505. MWL does not possess sufficient information to admit or deny the allegations in paragraph 505.

506. MWL does not possess sufficient information to admit or deny the allegations in paragraph 506.

507. MWL does not possess sufficient information to admit or deny the allegations in paragraph 507.

508. MWL does not possess sufficient information to admit or deny the allegations in paragraph 508.

SUDAN

509. MWL does not possess sufficient information to admit or deny the allegations in paragraph 509.

510. MWL does not possess sufficient information to admit or deny the allegations in paragraph 510.

511. MWL does not possess sufficient information to admit or deny the allegations in paragraph 511.

512. MWL does not possess sufficient information to admit or deny the allegations in paragraph 512.

513. MWL does not possess sufficient information to admit or deny the allegations in paragraph 513.

514. MWL does not possess sufficient information to admit or deny the allegations in paragraph 514.

515. MWL does not possess sufficient information to admit or deny the allegations in paragraph 515.

516. MWL does not possess sufficient information to admit or deny the allegations in paragraph 516.

SYRIAN ARAB REPUBLIC

517. MWL does not possess sufficient information to admit or deny the allegations in paragraph 517.

518. MWL does not possess sufficient information to admit or deny the allegations in paragraph 518.

519. MWL does not possess sufficient information to admit or deny the allegations in paragraph 519.

520. MWL does not possess sufficient information to admit or deny the allegations in paragraph 520.

521. MWL does not possess sufficient information to admit or deny the allegations in paragraph 521.

522. MWL does not possess sufficient information to admit or deny the allegations in paragraph 522.

523. MWL does not possess sufficient information to admit or deny the allegations in paragraph 523.

524. MWL does not possess sufficient information to admit or deny the allegations in paragraph 524.

THE ISLAMIC REPUBLIC OF IRAN

525. MWL does not possess sufficient information to admit or deny the allegations in paragraph 525.

526. MWL does not possess sufficient information to admit or deny the allegations in paragraph 526.

527. MWL does not possess sufficient information to admit or deny the allegations in paragraph 527.

528. MWL does not possess sufficient information to admit or deny the allegations in paragraph 528.

529. MWL does not possess sufficient information to admit or deny the allegations in paragraph 529.

530. MWL does not possess sufficient information to admit or deny the allegations in paragraph 530.

531. MWL does not possess sufficient information to admit or deny the allegations in paragraph 531.

532. MWL does not possess sufficient information to admit or deny the allegations in paragraph 532.

533. MWL does not possess sufficient information to admit or deny the allegations in paragraph 533.

534. MWL does not possess sufficient information to admit or deny the allegations in paragraph 534.

535. MWL does not possess sufficient information to admit or deny the allegations in paragraph 535.

REPUBLIC OF IRAQ

536. MWL does not possess sufficient information to admit or deny the allegations in paragraph 536.

537. MWL does not possess sufficient information to admit or deny the allegations in paragraph 537.

538. MWL does not possess sufficient information to admit or deny the allegations in paragraph 538.

539. MWL does not possess sufficient information to admit or deny the allegations in paragraph 539.

540. MWL does not possess sufficient information to admit or deny the allegations in paragraph 540.

PLAINTIFFS' INJURIES

541. MWL does not possess sufficient information to admit or deny the allegations in paragraph 541.

542. MWL does not possess sufficient information to admit or deny the allegations in paragraph 542.

- 543. MWL does not possess sufficient information to admit or deny the allegations in paragraph 543.
- 544. MWL does not possess sufficient information to admit or deny the allegations in paragraph 544.
- 545. MWL does not possess sufficient information to admit or deny the allegations in paragraph 545.
- 546. MWL does not possess sufficient information to admit or deny the allegations in paragraph 546.
- 547. MWL does not possess sufficient information to admit or deny the allegations in paragraph 547.
- 548. MWL does not possess sufficient information to admit or deny the allegations in paragraph 548.
- 549. MWL does not possess sufficient information to admit or deny the allegations in paragraph 549.
- 550. MWL does not possess sufficient information to admit or deny the allegations in paragraph 550.
- 551. MWL does not possess sufficient information to admit or deny the allegations in paragraph 551.
- 552. MWL does not possess sufficient information to admit or deny the allegations in paragraph 552.
- 553. MWL does not possess sufficient information to admit or deny the allegations in paragraph 553.

- 554. MWL does not possess sufficient information to admit or deny the allegations in paragraph 554.
- 555. MWL does not possess sufficient information to admit or deny the allegations in paragraph 555.
- 556. MWL does not possess sufficient information to admit or deny the allegations in paragraph 556.
- 557. MWL does not possess sufficient information to admit or deny the allegations in paragraph 557.
- 558. MWL does not possess sufficient information to admit or deny the allegations in paragraph 558.
- 559. MWL does not possess sufficient information to admit or deny the allegations in paragraph 559.
- 560. MWL does not possess sufficient information to admit or deny the allegations in paragraph 560.
- 561. MWL does not possess sufficient information to admit or deny the allegations in paragraph 561.
- 562. MWL does not possess sufficient information to admit or deny the allegations in paragraph 562.
- 563. MWL does not possess sufficient information to admit or deny the allegations in paragraph 563.
- 564. MWL does not possess sufficient information to admit or deny the allegations in paragraph 564.

565. MWL does not possess sufficient information to admit or deny the allegations in paragraph 565.
566. MWL does not possess sufficient information to admit or deny the allegations in paragraph 566.
567. MWL does not possess sufficient information to admit or deny the allegations in paragraph 567.
568. MWL does not possess sufficient information to admit or deny the allegations in paragraph 568.
569. MWL does not possess sufficient information to admit or deny the allegations in paragraph 569.
570. MWL does not possess sufficient information to admit or deny the allegations in paragraph 570.
571. MWL does not possess sufficient information to admit or deny the allegations in paragraph 571.
572. MWL does not possess sufficient information to admit or deny the allegations in paragraph 572.
573. MWL does not possess sufficient information to admit or deny the allegations in paragraph 573.
574. MWL does not possess sufficient information to admit or deny the allegations in paragraph 574.
575. MWL does not possess sufficient information to admit or deny the allegations in paragraph 575.

- 576. MWL does not possess sufficient information to admit or deny the allegations in paragraph 576.
- 577. MWL does not possess sufficient information to admit or deny the allegations in paragraph 577.
- 578. MWL does not possess sufficient information to admit or deny the allegations in paragraph 578.
- 579. MWL does not possess sufficient information to admit or deny the allegations in paragraph 579.
- 580. MWL does not possess sufficient information to admit or deny the allegations in paragraph 580.
- 581. MWL does not possess sufficient information to admit or deny the allegations in paragraph 581.
- 582. MWL does not possess sufficient information to admit or deny the allegations in paragraph 582.
- 583. MWL does not possess sufficient information to admit or deny the allegations in paragraph 583.
- 584. MWL does not possess sufficient information to admit or deny the allegations in paragraph 584.
- 585. MWL does not possess sufficient information to admit or deny the allegations in paragraph 585.
- 586. MWL does not possess sufficient information to admit or deny the allegations in paragraph 586.

- 587. MWL does not possess sufficient information to admit or deny the allegations in paragraph 587.
- 588. MWL does not possess sufficient information to admit or deny the allegations in paragraph 588.
- 589. MWL does not possess sufficient information to admit or deny the allegations in paragraph 589.
- 590. MWL does not possess sufficient information to admit or deny the allegations in paragraph 590.
- 591. MWL does not possess sufficient information to admit or deny the allegations in paragraph 591.
- 592. MWL does not possess sufficient information to admit or deny the allegations in paragraph 592.
- 593. MWL does not possess sufficient information to admit or deny the allegations in paragraph 593.
- 594. MWL does not possess sufficient information to admit or deny the allegations in paragraph 594.
- 595. MWL does not possess sufficient information to admit or deny the allegations in paragraph 595.
- 596. MWL does not possess sufficient information to admit or deny the allegations in paragraph 596.
- 597. MWL does not possess sufficient information to admit or deny the allegations in paragraph 597.

COUNT I: PLAINTIFFS V. ALL DEFENDANTS TRESPASS

598. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
599. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
600. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
601. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
602. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
603. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT II: PLAINTIFFS V. ALL DEFENDANTS WRONGFUL DEATH

604. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

605. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

606. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT III PLAINTIFFS V. ALL DEFENDANTS SURVIVAL ACTION

607. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

608. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

609. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT IV PLAINTIFFS V. ALL DEFENDANTS ASSAULT AND BATTERY

610. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

611. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

612. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

613. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT V PLAINTIFFS V. DEFENDANTS

**INTENTIONAL AND/OR NEGLIGENT INFLICTION OF EMOTIONAL
DISTRESS**

614. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

615. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

616. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

617. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT VI PLAINTIFFS V. DEFENDANTS TORTURE VICTIM PROTECTION

ACT

618. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
619. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
620. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
621. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
622. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT VII PLAINTIFFS V. ALL DEFENDANTS CONSPIRACY

623. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

624. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

625. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

626. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT VIII PLAINTIFFS V. ALL DEFENDANTS 18 U.S.C. § 1962(A) – CIVIL

RICO

627. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

628. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

629. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT IX PLAINTIFFS V. ALL DEFENDANTS AIDING AND ABETTING

630. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
631. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
632. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
633. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT X PLAINTIFFS V. ALL DEFENDANTS 18 U.S.C. § 2333

634. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
635. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
636. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

637. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

638. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT XI PLAINTIFFS V. ALL DEFENDANTS NEGLIGENCE

639. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

640. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

641. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

642. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

643. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT XII PLAINTIFFS V. ALL DEFENDANTS PUNITIVE DAMAGES

644. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
645. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.
646. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

FIRST AFFIRMATIVE DEFENSE

(Failure to State a Claim)

Plaintiffs' claims fail to state a claim against MWL for which relief may be granted.

SECOND AFFIRMATIVE DEFENSE

(Causation)

There is no causal connection between any of MWL's activities and plaintiffs' injuries.

THIRD AFFIRMATIVE DEFENSE

(Causation)

No act or omission of any agent, servant, or employee of MWL proximately caused any harm or damages to plaintiffs.

FOURTH AFFIRMATIVE DEFENSE

(Causation)

No act or omission of any agent, servant, or employee of MWL proximately caused any harm or damages to plaintiffs.

FIFTH AFFIRMATIVE DEFENSE

(Other Tortfeasors)

Plaintiffs' damages and injuries were caused by other individuals or entities who are, or are not, named as parties to this action.

SIXTH AFFIRMATIVE DEFENSE

(Improper Venue)

This Court is not the proper venue for plaintiffs' claims against MWL.

SEVENTH AFFIRMATIVE DEFENSE

(Subject Matter Jurisdiction)

This Court does not have subject matter jurisdiction over plaintiffs' claims against MWL.

EIGHTH AFFIRMATIVE DEFENSE

(Personal Jurisdiction)

This Court does not have personal jurisdiction over plaintiffs' claims against MWL.

NINTH AFFIRMATIVE DEFENSE

(Estoppel)

Plaintiffs are estopped from receiving the relief requested against MWL.

TENTH AFFIRMATIVE DEFENSE

(Statute of Limitations)

Plaintiffs' claims against MWL are barred, in whole or in part, by the applicable statute of limitations.

ELEVENTH AFFIRMATIVE DEFENSE

(Punitive Damages)

Plaintiffs' claims for punitive damages against MWL are barred because MWL's activities, as alleged by plaintiffs, were not committed with intent, malice, willful and outrageous conduct aggravated by evil motive, or reckless indifference, and none of MWL's activities in any way were intended to, or did harm, the plaintiffs in this action.

TWELFTH AFFIRMATIVE DEFENSE

(No Double Recovery)

Plaintiffs' claims for compensatory and punitive damages are barred to the extent that some plaintiffs are also seeking recovery against MWL, for the same or similar claims, in the civil actions comprising the multi-district entitled *In re Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (RCC), pending in the United States District Court for the Southern District of New York.

THIRTEENTH AFFIRMATIVE DEFENSE

MWL is an instrumentality of the government of the Kingdom of Saudi Arabia. Accordingly, MWL is immune from suit.

FOURTEENTH AFFIRMATIVE DEFENSE

The Central Intelligence Agency, The Federal Bureau of Investigation, and other agencies of the United States government had information and resources to prevent the September 11, 2001, attacks from occurring. But for their failure to utilize this information and these resources, MWL would not be a named defendant in this action.

FIFTEENTH AFFIRMATIVE DEFENSE

In response to plaintiffs' claims, MWL intends to invoke any other defenses, including, affirmative defenses, as they may become apparent through discovery, and reserve the right, in accordance with the Federal Rules of Civil Procedure and the Local Civil Rules of the United States District Court for the Southern District of New York, to assert such defenses.

MWL requests that the Plaintiffs' Third Party Amended Complaint be dismissed with prejudice as to MWL, and the the Court award attorney's fees and costs to MWL in defending this case with no factual or legal basis against MWL, and award any other relief that the Court deems just under the circumstances.

Respectfully submitted,

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